

CT Corporation
Service of Process Notification
06/22/2022
CT Log Number 541787616

Service of Process Transmittal Summary

TO: KIM LUNDY- EMAIL
Walmart Inc.
GLOBAL GOVERNANCE/CENTRAL INTAKE, 2914 SE 1 STREET MS#0200
BENTONVILLE, AR 72712-3148

RE: Process Served in Ohio

FOR: Sam's West, Inc. (Domestic State: AR)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: Carol J. Flores and Ralph L. Flores // To: Sam's West, Inc.

DOCUMENT(S) SERVED: Summons, Complaint

COURT/AGENCY: Richland County Court of Common Pleas, OH
Case # 2022CV0283N

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 07/05/2020, at 1070 N. Lexington- Springmill Road in Ontario, County of Richland, Ohio

PROCESS SERVED ON: CT Corporation System, Columbus, OH

DATE/METHOD OF SERVICE: By Traceable Mail on 06/22/2022 postmarked on 06/15/2022

JURISDICTION SERVED: Ohio

APPEARANCE OR ANSWER DUE: Within 28 days after service, exclusive of the day of service

ATTORNEY(S)/SENDER(S): Melanie S Fahey
Rinehardt Law Firm
2404 Park Avenue West
Mansfield, OH 44906
419-529-2020

ACTION ITEMS: CT has retained the current log, Retain Date: 06/22/2022, Expected Purge Date: 07/02/2022
Image SOP

REGISTERED AGENT CONTACT: CT Corporation System
4400 Easton Commons Way
Suite 125
Columbus, OH 43219
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT





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disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

US POSTAGE

CERTIFIED MAIL®



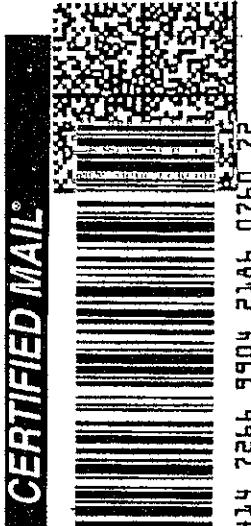
RICHLAND COUNTY

CLERK

P.O. Box 127 • MANSFIELD, OH 44901

RETURN SERVICE REQUESTED

quadrant
FIRST-CLASS MAIL
IMI
\$007.53⁰
06/15/2022 ZIP 44903
043M32205548



2022 CV 0283 N
9414726699042186076072

SAMS WEST INC
DBA SAMS CLUB C/O CT CORPORATION SYSTEM
4400 EASTON COMMONS WAY SUITE 125
COLUMBUS, OH 43215

43219\$6223 C015

SUMMONS
Richland County Common Pleas Court of Ohio

CAROL J FLORES

CASE: 2022 CV 0283 N

VS

SAMS WEST INC

SAMS WEST INC
DBA SAMS CLUB C/O CT CORPORATION SYSTEM
4400 EASTON COMMONS WAY SUITE 125
COLUMBUS, OH 43215

You have been named Defendant (s) in a complaint filed in Richland County Court of Common Pleas, 50 Park Ave East, Mansfield, Ohio by

CAROL J FLORES
119 EDGEWOOD DRIVE
GALION, OH 44833

Plaintiff (s). A copy of the Complaint is attached hereto. The name and address of the Plaintiff's Attorney is,

MELANIE S FAHEY
RINEHARDT LAW FIRM
2404 PARK AVENUE WEST
MANSFIELD, OH 44906

You are hereby summoned and required to serve upon the Court, your answer to the complaint within **28 days** after service of this summons on you, exclusive of the day of service. You must also serve a copy of the answer upon the Plaintiff's Attorney, or upon the Plaintiff, if he/she has no Attorney of record within 3 days after filing the Answer with the Court.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

June 15, 2022

LINDA H FRARY
CLERK, COURT OF COMMON PLEAS

By:

B. Dalton
Deputy Clerk

*****SUMMONS SENT BY REGULAR MAIL AS INSTRUCTED, ON DATE ABOVE. PER CIV. R. 4.6(D), YOUR ANSWER DATE IS:

SHERIFF'S RETURN

Service and Return:	\$ _____
Mileage	\$ _____
TOTAL	\$ _____

How Served: (Mail / Person)

When Served: _____

Sheriff

RICHLAND COUNTY
CLERK OF COURTS
FILED

IN THE RICHLAND COUNTY COMMON PLEAS COURT

2022 JUN 13 P 2:58

Carol J. Flores
119 Edgewood Drive
Galion, OH 44833

and

Ralph L. Flores
119 Edgewood Drive
Galion, OH 44833

Plaintiffs,

vs.

Sam's West, Inc
dba Sam's Club
c/o Statutory Agent CT Corporation System
4400 Easton Commons Way Suite 125
Columbus OH 43219

Defendant.

CASE NO. 22CV283

NAUMOFF

COMPLAINT - JURY DEMAND
ENDORSED HEREON

I, Linda H. Frary, Clerk of Courts
Richland County, Ohio, hereby certify that
the foregoing is a true and correct copy of the
COMPLAINT

filed with me 6-13-22

B. DALTON

Deputy Clerk of Courts

COUNT ONE

1. Defendant Sam's West Inc dba Sam's Club is a corporation or other business entity duly organized and doing business in the State of Ohio and at all times relevant hereto, either in whole or in part, operated the store and/or maintained the business premises known as Sam's Club, located at 1070 N. Lexington-Springmill Road, in the City of Ontario, County of Richland, State of Ohio.

2. On or about July 5, 2020, Plaintiff Carol J. Flores was a business invitee of Defendant and went to the above-described business premises known as Sam's Club, located at 1070 N. Lexington-Springmill Road in Ontario, Ohio.

3. At the above time and place, Defendant Sam's West Inc dba Sam's Club knew of water having accumulated on the floor located in the shelving area in the back of the store. Defendant knew or should have known of the existence of the water but chose not remedy or warn of such dangerous condition. The water on the floor at this location made the floor slippery and created an invisible slip and fall hazard to its customers. The water was not reasonably detectable to a person using ordinary care and created an unreasonable risk of bodily injury to invitees traversing that area of the merchandise.

4. The water on the Defendant's floor constituted an unreasonably dangerous condition and Defendant was negligent in that, acting through its employees, created the condition and it failed to remedy the dangerous condition and failed to warn its customers of the presence of such dangerous condition.

5. On said date as Plaintiff Carol J. Flores was shopping at the back of the store looking up on the shelves for a certain item. Plaintiff Carol J. Flores fell to the ground in a split-like style as her foot came into contact with the water. Plaintiff Carol J. Flores was unaware of the presence of the water and in fact such condition was invisible to her.

6. As a direct and proximate result of the negligence of the Defendant, Plaintiff Carol J. Flores sustained multiple severe injuries, including

- Hamstring injury, right
- Contusion of left knee
- Strain of muscle, fascia and tendon of right hip
- Strain of unspecified muscles, fascia and tendons at thigh level, right thigh
- Low back pain
- Strain of muscle, fascia and tendon of lower back
- Contusion of right hip
- Sprain of unspecified site of right knee
- Intervertebral disc disorders with radiculopathy, lumbar region
- Myalgia, other site - myofascial pain
- Radiculopathy, sacral and sacrococcygeal region
- Lumbar pain with right leg radiculopathy

- Primary insomnia
- Chronic pain syndrome
- Lumbar facet arthropathy

suffered pain of mind and of body and was otherwise injured. A portion of said injuries are permanent and continuing.

7. As a direct and proximate result of the negligence of the Defendant, Plaintiff Carol J. Flores has incurred medical expenses and it is reasonably certain that further such expenses will be incurred in the future.

8. As a direct and proximate result of the negligence of Defendant, Plaintiff Carol J. Flores has suffered loss of income.

COUNT TWO

9. Plaintiffs restate the statements and allegations contained in Paragraphs One through Nine as if fully rewritten herein.

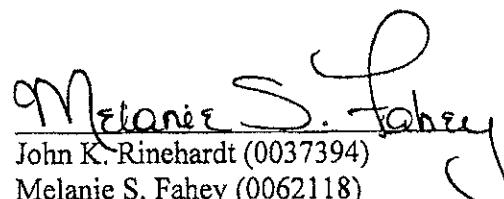
10. At all times relevant hereto, Plaintiff Ralph L. Flores and Plaintiff Carol J. Flores were and are husband and wife.

11. As a direct and proximate result of the negligence of the Defendant, Plaintiff Ralph L. Flores has been deprived of the services, society and companionship of Plaintiff Carole J. Flores and it is reasonably certain that Plaintiff Ralph L. Flores will suffer further loss of consortium in the future.

WHEREFORE, Plaintiffs Carol J. Flores and Ralph L. Flores demand judgment against Defendant in such amount in excess of Twenty-Five Thousand and 00/100 Dollars (\$25,000.00) as will reasonably compensate for the damages suffered as set forth above.

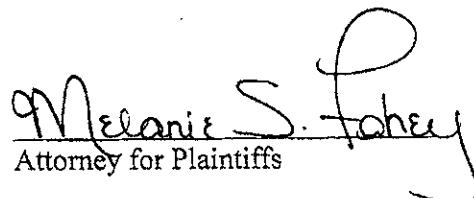
Plaintiffs further demand an award of costs, interest and such other relief as the Court deems just.

Respectfully submitted,


John K. Rinehardt (0037394)
Melanie S. Fahey (0062118)
Rachel A. Rinehardt (0097825)
Rinehardt Law
2404 Park Ave West
Mansfield, OH 44906
(419) 529-2020, fax (419) 529-2717
john@lawfirm2020.com
melanie@lawfirm2020.com
rachel@lawfirm2020.com
Attorney for Plaintiffs

JURY DEMAND

Plaintiffs respectfully demand trial by jury.


Attorney for Plaintiffs